

Application Serial No. 10/627,070
Amendment A
Reply to Office Action of March 10, 2005

REMARKS/ARGUMENTS

This paper is being submitted in response to the Non-Final Office Action dated March 10, 2005, having a shortened statutory period set to expire June 10, 2005, wherein:

Claims 1-11 were presented for examination; and

Claims 1-11 were rejected.

Claims 2 and 8 have been amended herein, no claims have been canceled, and new claims 12-16 have been presented for examination by this amendment. Accordingly, claims 1-16 remain currently pending in the above-identified patent application. Applicant submits that no new matter has been added by this amendment and respectfully requests reconsideration of all pending claims in light of the amendments and remarks made herein.

Claim Rejections under 35 U.S.C. § 102

In the present Office Action, claims 1-11 were rejected under 35 U.S.C. § 102(a) as being anticipated by a web document dated April 27, 2003 and entitled, "ATL 4/48 and ATL 2/24 Library – Intelligent Solutions" (hereinafter, "*Intelligent Solutions*"). While not conceding that the Examiner's cited references qualify as prior art but in the interest of expediting prosecution, Applicant has elected to traverse the Examiner's rejections as follows. Applicant reserves the right, for example in a continuation application, to establish that one or more of the Examiner's cited references do not qualify as prior art with respect to invention embodiments currently or subsequently claimed.

Applicant's claim 1 as originally presented (emphasis supplied) recites an automated data storage library, comprising, *inter alia*,

a frame having a plurality of data storage drives mounted thereto...[and]
a single control station...comprising:

a single display device for touch-screen, operational control of all functions of all
of the data storage drives for centralizing management of all of the data
storage drives

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With regard to Applicant's claim 1, a figure of a "520 Series ATL" on page 1, column 2 and page 1, column 2, lines 1-10 of *Intelligent Solutions* are cited in the present Office Action as teaching "a frame having a plurality of data storage drives mounted thereto" as claimed. Applicant respectfully disagrees.

Intelligent Solutions fails to teach "a frame" as claimed

A "frame" or storage module as claimed by Applicant is described at page 7, paragraph 20, of Applicant's specification which reads in part (emphasis supplied):

The data storage and retrieval system 100 of Figure 1 is typically assembled from a series of frames or storage modules 101, such as the L-frame type storage module illustrated in Figures 3 and 4. A storage module is an expansion component of the library. Frames, accessors, magazines, etc. may comprise examples of storage modules.

A "frame" as claimed by Applicant is therefore a modular element used to assemble or expand a data storage and retrieval system. While not stated explicitly in the terse description of the Examiner's cited reference, the "520 Series" depicted by *Intelligent Solutions* appears to be a standalone unit. For example, the "520 Series" of *Intelligent Solutions* includes an "Intelligrip high reliability robotic/drive system" within it (*Intelligent Solutions*, Page 1, Column 3, Lines 3-5) rather than a separate "robotic picker" component of an automated data storage library as claimed. Moreover, while *Intelligent Solutions* teaches that the "520 Series" itself may be expanded (e.g., "from a base model of two DLT4000 or 7000 drives up to four", *Intelligent Solutions*, Page 1, Column 2, Lines 1-10), there is no teaching or suggestion within the Examiner's cited portion of *Intelligent Solutions* that the "520 Series" may itself be used to expand an automated data storage library as claimed.

Applicant has further clarified this distinction between embodiments of Applicant's invention and the teaching of *Intelligent Solutions* within newly submitted claim 12 which recites (emphasis supplied) an automated data storage library, comprising, *inter alia*,

a plurality of storage modules, said plurality of storage modules comprising
a storage frame module,
a storage shelf module to removably store data storage media, and
an accessor module;

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Applicant therefore respectfully submits that the Examiner's cited portions of *Intelligent Solutions* fail to teach "a frame" or "a plurality of storage modules" as claimed.

With regard to Applicant's claim 1, the section entitled, "Control Panel Features and Functions" at page 3, column 1 of *Intelligent Solutions* and in particular the "LCD status display" is cited in the present Office Action as teaching "a single display device for touch-screen, operational control of all functions of all of the data storage drives" as claimed. Applicant respectfully disagrees.

Intelligent Solutions fails to teach "a single display device" as claimed

As clearly recited in Applicant's original claim 1, the claimed "single display device" includes at least two characteristics, "touch-screen" operation and "operational control" of all functions of all of the data storage drives. *Intelligent Solutions*, in the Examiner's cited portion, teaches "standby and stop switches with indicator lights", a "fault light", "a 16-character, 2-line LCD status display area", "up/down scroll menu item select switches" and "load port open/close switches" (emphasis supplied) as control panel features and functions. *Intelligent Solutions* fails to teach however that the LCD status display area is capable of "touch-screen" operation as required by Applicant's claims or how or why a 2-line LCD display area would be implemented or utilized as a "touch-screen" display device. Moreover, as the 2-line LCD is described only as a "status" display area, the cited portions of *Intelligent Solutions* fail to teach an LCD or other display device for "operational control" as claimed.

Applicant has more explicitly clarified this distinction between embodiments of Applicant's invention and the teaching of *Intelligent Solutions* within newly submitted claim 12 which recites (emphasis supplied) an automated data storage library, comprising, *inter alia*,

a display device configured to display a graphical representation of said plurality of drives and to receive a touch screen selection input utilizing said graphical representation, wherein said touch screen selection input specifies a selected storage drive of said plurality of storage drives, and

Applicant therefore respectfully submits that the Examiner's cited portions of *Intelligent Solutions* fail to teach "a single display device" or "a display device" as claimed.

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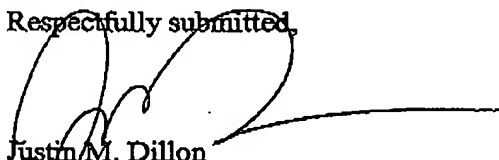
For at least the foregoing reasons, Applicant respectfully submits that claim 1, as originally submitted, and claim 12 as newly submitted herein for consideration are each independently allowable in view of the Examiner's cited reference, *Intelligent Solutions*. Applicant's claim 7 includes one or more elements substantially similar to those described with respect to claim 1 and is therefore allowable for at least the reasons stated with respect to that claim. All remaining claims depend directly or indirectly from Applicant's claims 1, 7, or 12 and are therefore similarly allowable.

CONCLUSION

In light of the amendments and remarks made herein, Applicant respectfully submits that all pending claims are allowable and requests a Notice of Allowance thereof.

No extension of time for this response is believed to be necessary. However, in the event an extension of time is required, that extension of time is hereby requested. Please charge any fee associated with an extension of time as well as any other fee necessary to further the prosecution of this application to **IBM CORPORATION DEPOSIT ACCOUNT No. 09-0449**.

Respectfully submitted,



Justin M. Dillon
Registration No. 42,486
DILLON & YUDELL LLP
8911 North Capital of Texas Highway
Suite 2110
Austin, Texas 78759
512.343.6116

ATTORNEY FOR APPLICANT(S)